



Flathead Audubon Society

P.O. Box 1973
Kalispell, MT 59904

U.S. Fish and Wildlife Service
Division of Fisheries and Habitat Conservation
Attention: Wind Energy Guidelines

May 13, 2011

Dear Sirs:

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. We have reviewed the Draft Land-Based Wind Energy Guidelines and submit the following comments.

The use of a tiered approach to analyze, assess, develop mitigation, and monitor wind energy projects seems both logical and reasonable and allows for the use of best available science.

One drawback appears to be the lack of specific direction on what to do when conflicts are identified or specific direction on what mitigation is appropriate for what conflict situations. Appendix B (Best Management Practices for Wind Energy Development) contains some direction but appears to be limited and too generic. On page 13, Avian and Bat Protection Plans are discussed but no real details are given for how to do them or what should be included. More direction is needed for these Avian and Bat Protection Plans.

It is not clear how the guidelines would work in the case of a major conflict being identified such as a known major migration route, prairie grouse lek, raptor nesting area, etc. On page 30 under Tier 2 the guides just say "...developer should thoroughly consider whether to proceed or discontinue the project..." It would appear that the developer can just as easily decide to continue as to drop or modify the project. More definite direction is needed so such conflicts can be resolved to maintain the identified wildlife values.

As long as the guidelines are voluntary it is questionable how effective they will be in achieving favorable results for wildlife. Developers are not likely to expend the effort as long as the guidelines are voluntary. The guidelines should be mandatory at least on all Federal lands and on all private lands where any Federal money or participation is involved.

On page 31 in Tier 3 it mentions design, construction, and operation features but no specifics are given (perhaps some are on pages 58-60 in Mitigation) but these are the things that need spelled out and updated as new science comes along.

In summary, the guidelines method of using a tiered approach is good but more specific direction needs included and they should be mandatory on Federal lands and private lands where Federal money or participation is involved.

Thank you for considering our comments.

Lewis Young, Conservation Chair
Flathead Audubon Society
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Kalispell, MT 59904